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UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	Edwin Bolduan et al
Application Number:	10/608,571
Filing Date:	06/27/2003
Group Art Unit:	3749
Examiner:	Jiping Lu
Title:	Method and Configuration for Removing Moisture from Items of Clothing

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF

Dear Sir:

Pursuant to 37 CFR 1.192, Appellants hereby file an Appeal Brief in the above-identified application with a request for a three-month extension of time extending the period for reply to October 9, 2006. This Appeal Brief is also accompanied by the requisite fee set forth in 37 CFR 1.17(f).

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(1) REAL PARTY IN INTEREST

The real party in interest is the inventors, BSH Bosch und Siemens Hausgeraete GmbH, the Assignee in the application, which is a joint venture between Siemens AG and Robert Bosch GmbH, all three of which are German companies.

(2) RELATED APPEALS AND INTERFERENCES

There are no appeals or interferences that will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

(3) STATUS OF CLAIMS

Claims 1-16 are pending in the application, all of which are rejected and on Appeal.

(4) STATUS OF AMENDMENTS

Claims 1-16 on Appeal before the Board are those presented prior to the Final Office Action, dated May 9, 2006. No amendments were filed after the final rejection.

(5) SUMMARY OF CLAIMED SUBJECT MATTER

Claim 1 of the present application recites a method of removing moisture from items of clothing. The inventive method comprises bringing an item of clothing 2 (see the specification of the present application at page 16, lines 5-8) into contact with at least one absorbent body 20 (see page 17, lines 10-16 and page 22, line 18 to page 23, line 13) of an absorbent material in the form of a continuous strand. The inventive method also comprises moving the at least one absorbent body 20 and the item of clothing 2 at the same speed. (see page 17, lines 14-16) The inventive method also comprises subsequently separating the item of clothing 2 from the at least one absorbent body 20.

Claim 3 of the present application recites a method of removing moisture from items of clothing. The inventive method comprises bringing an item of clothing 2 (see page 16, lines 5-8) into contact with at least one absorbent body 20 (see page 17, lines 10-16 and page 22, line 18 to page 23, line 13) of an absorbent material in the form of a continuous strand. The inventive method also comprises moving the at least one absorbent body 20 and the item of clothing 2 at the same speed. (see page 17, lines 14-16) The inventive method also comprises subsequently separating the item of clothing 2 from the at least one absorbent body 20. The inventive method also comprises removing moisture from the absorbent body 20 following contact with the item of clothing 2 (see page 18, lines 1-9). The inventive method also comprises providing the absorbent body 2 with a plurality of sections. The inventive method also comprises successively bringing individual sections of the absorbent body into contact with the item of clothing, separating the section from the item of clothing, and removing moisture from the item of clothing. (see page 22, line 18 to page 23, line 13)

Claim 11 of the present application recites a method of removing moisture from items of clothing. The inventive method comprises bringing an item of clothing 2 (see page 16, lines 5-8) into contact with at least one absorbent body 20 (see page 17, lines 10-16 and page 22, line 18 to page 23, line 13) of an absorbent material in the form of a continuous strand and having a plurality of sections. The inventive method also comprises circulating the absorbent body 20 to successively move individual sections of the absorbent body 20 into contact with the item of clothing 2 and to a configuration for

removing moisture from a section of the absorbent body 20. (see page 22, line 18 to page 23, line 13) The inventive method also comprises separating the section from the item of clothing 2. The inventive method also comprises subjecting the item of clothing to action of at least one gas jet 7 acting transversely to a surface of the item of clothing 2 following contact with the absorbent body 20. (see page 24, lines 10-22) The inventive method also comprises removing moisture from the absorbent body 20 following contact with the item of clothing 2. (see page 22, line 18 to page 23, line 13)

Claim 12 of the present application recites a configuration for removing moisture from items of clothing. The inventive configuration comprises at least one absorbent body 20 (see page 17, lines 10-16) of an absorbent material in the form of a continuous strand being brought into contact with an item of clothing 2 (see page 16, lines 5-8) and being moved at the same speed as the item of clothing 2. (see page 17, lines 14-16) The inventive configuration comprises a contacting device 21 adapted to contact an item of clothing 2 with said at least one absorbent body 20 and to separate the item of clothing 2 from said at least one absorbent body 20. (see page 17, lines 18-26)

Claim 16 of the present application recites a configuration for removing moisture from items of clothing. The inventive configuration comprises at least one absorbent body 20 of a microfiber material. The inventive configuration also comprises a contacting device adapted to contact an item of clothing 2 with said at least one absorbent body 20 and to separate the item of clothing from said at least one absorbent body 20, said contacting device having a pressure-exerting roller 21 spaced apart from said at least one absorbent body 20. (see page 17, lines 18-26) The inventive configuration also comprises a transporting device 3 (see page 16, lines 8-13) moving a plurality of items of clothing 2 successively in a direction of said at least one absorbent body 20 and away therefrom and between said at least one absorbent body 20 and said pressure-exerting roller 21. (see page 22, line 18 to page 23, line 13)

(6) GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

(a) Whether Claims 1-4 and 6-16 are unpatentable under 35 U.S.C. § 103(a) over Japan No. JP8-49161 to Shibuya (hereinafter "Shibuya") in view of US Patent No. 1,773,167 to Bronander (hereinafter "Bronander").

(b) Whether Claim 16 is unpatentable under 35 U.S.C. § 103(a) over Bronander.

(7) **ARGUMENT**

(a) Rejection under 35 U.S.C. § 103(a) over Shibuya in view of Bronander

Claim 1

Independent Claim 1 recites a method of removing moisture from items of clothing, which comprises: bringing an item of clothing into contact with **at least one absorbent body of an absorbent material** in the form of a continuous strand; moving the at least one absorbent body and the item of clothing **at the same speed**; and subsequently separating the item of clothing from the at least one absorbent body.

Shibuya discloses a system for chemically processing clothing and applying a chemical agent to the clothing. In Shibuya, the clothing (40) is placed on a conveying member (12) that carries the clothing (40) through the device. The conveying member (12) includes a belt (10) that is both air permeable and liquid permeable. The device includes a first steam jet device (14) located below the belt (10) that sprays steam that passes through the belt (10) to reach the clothing (40). A chemical agent sprinkler (16) includes spray nozzles (28, 29) located below the belt (10) that spray the clothing (40) with the chemical agent and binder liquid. As shown in Fig. 1, the belt (10) is located between the spray nozzle (29) and the clothing (40) and the spray nozzle (29) must spray the chemical agent through the belt (10) to reach the clothing (40). A second steam jet device (18) is also located below the belt (10) and sprays the clothing (40) with steam that passes through the belt (10) to reach the clothing (40). A chamber (37) provides a hot air blast onto the clothing (40) to effect firm sticking of the chemical agent to the clothing (40).

Bronander discloses a method and apparatus for treating cloth material (15) on large rolls or sheets to remove blemishes after a dyeing process. The machine includes a plurality of cloth rubbing devices (A, B, C, D) arranged to rub one or both surfaces of the cloth material (15) in opposite directions as the material passes through the machine. Each of these cloth rubbing devices (A, B, C, D) include two rolls (10, 11) and an endless belt (12) formed of suitable flexible absorbent material such as felt. Some of the cloth rubbing devices rub the cloth (15) in the opposite direction of movement as the cloth, and some of the cloth rubbing devices rub the cloth (15) in the same direction of movement as the cloth.

The Examiner takes the position that it would have been obvious to substitute the absorbent material endless belt (12) of Bronander for the mesh air and liquid permeable a belt (10) of Shibuya. In the Final Office action dated February 9, 2006, the Examiner states that "it would have been obvious to one having ordinary skill in the art at the time the invention was made to substitute conveyor of Bronander for the conveyor 10 of Shibuya and to provide the method and apparatus of Shibuya with two absorbent bodies on both side the of the clothing and a pressure-exerting roller spaced apart from the absorbent conveyor as taught by Bronander in order to absorb clothes moisture and improve the cloth dewatering efficiency."

To establish a prima facie case of obviousness, there must be some teaching, suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Mere identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. See *In re Rouffet*, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457 (Fed. Cir. 1998). Rather, to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant. See *In re Dance*, 160 F.3d 1339, 1343, 48 USPQ2d 163.5, 1637 (Fed. Cir. 1998); *In re Gordon*, 733 F.2d 900, 902, 221 USPQ 1125, 1127 (Fed. Cir. 1984).

The Examiner has not identified any teaching, suggestion or motivation within the prior art to combine Shibuya and Bronander. The Examiner's stated reasons for making the modification "to absorb clothes moisture and improve the cloth dewatering efficiency" are not supported by the prior art. Neither Shibuya nor Bronander are relevant to absorbing moisture or cloth dewatering efficiency. Shibuya applies a chemical agent to the clothes and blasts the clothes with hot air at about 110-140 degrees to effect firm sticking of the chemical agent to the clothing. Bronander provides a frictional rubbing action on the rolled cloth material to remove marks or blemishes from the material after a dyeing process and does not include any reference to removing moisture or cloth dewatering. One of ordinary skill in the art considering either Shibuya or Bronander would not have been motivated to "improve cloth dewatering efficiency" of

either Shibuya or Bronander because neither of these devices are intended for that purpose.

To the contrary, both Shibuya and Bronander ***teach away*** from the proposed modification. Shibuya relates to applying a substance to clothing while Applicants' claimed invention relates to removing a substance from clothing. These are completely opposite functions. There is nothing in the prior art that would teach, suggest, or motivate one of ordinary skill in the art to modify Shibuya as proposed by the Examiner to perform a function that is completely opposite from the function described in the reference itself.

Shibuya discloses a conveying means (12) having a mesh-type belt (10) that is air and liquid permeable. As shown in Fig. 1 of Shibuya, the belt (10) carries the clothing (40) through various stations (14, 16, 18). (See Fig. 1 and paragraph 9) Each station (14, 16, 18) includes spray nozzles (24, 29) located below the belt (10) that spray a substance on the clothing (40). The belt (10) is positioned ***between*** the clothing (40) and each of the spray nozzles (24, 29). Therefore, each of these three separate spray nozzles (24, 29) must spray substances ***through*** the air and liquid permeable belt (10) and onto the clothing (40).

The belt (10) of Shibuya must be a mesh-type structure that is air and liquid permeable in order to permit the substances from the spray nozzles (24, 29) to pass through the belt (10) and reach the clothing (40). If the belt (10) of Shibuya was modified and made from an absorbent material, as suggested by the Examiner, the absorbent belt would absorb the substances discharged from the spray nozzles (24, 29) and ***prevent*** these substances from reaching the clothing (40). This would defeat the entire purpose of Shibuya of applying a chemical treatment to the clothing. Shibuya specifically requires that the belt (10) is made from an air and liquid permeable material in order to function properly and allow the substances to freely pass through the belt (40) and reach the clothing (40). Therefore, Shibuya teaches away from the Examiner's proposed modification of replacing the air and liquid permeable belt (10) with an absorbent material.

In addition, the proposed modification would render Shibuya completely unsatisfactory for its intended purpose. There can be no suggestion or motivation to

make the proposed modification if the proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984) The intended purpose of Shibuya is to apply a chemical agent to clothing. The modification proposed by the Examiner includes substituting the absorbent material of Bronander for the air and liquid permeable belt (10) of Shibuya. As described above, the belt (10) of Shibuya is located ***between*** the spraying devices and the clothing and the substances from the spray nozzles (24, 29) must pass ***through*** the air and liquid permeable belt (10) to reach the clothing (40). In the modification proposed by the Examiner, the absorbent material of Bronander in the belt would absorb the substances from the spray nozzles (24, 29) and prevent the substances from the from reaching the clothing (40). This proposed modification would render Shibuya unsatisfactory for its intended purpose of applying chemical agents to the clothing (40). Therefore, there can be no suggest or motivation to make the modification proposed by the Examiner.

Furthermore, there is no motivation to make the proposed modification to Shibuya because Shibuya already provides a suction device (20) and dryer (22) with a heater (36). Shibuya provides a hot blast with a temperature of about 110-140 degrees to effect firm sticking of the chemical agent to the clothing. Shibuya is specifically designed to have a drying means that ***does not contact*** the clothing to avoid disrupting the chemical agents applied to the clothing. The Examiner suggests modifying Shibuya to include the belt (10) made from an absorbent body to "improve the cloth dewatering efficiency". This proposed modification would be completely unnecessary and duplicative because Shibuya already has the suction device (20), dryer (22) and heater (36) specifically designed for it's intended purpose. Therefore, one of ordinary skill in the art would not be motivated to make the modification proposed by the Examiner.

Bronander also ***teaches away*** from the proposed modification. Bronander teaches rubbing the rolled cloth material with the absorbent felt material. As described above, Shibuya is specifically designed to have the suction device (20), dryer (22) and heater (36) in a non-contacting relationship to avoid disturbing the chemical agents applied to the clothing. Rubbing the chemically treated clothing (40) of Shibuya with the absorbent material, as taught by Bronander, would disrupt the application of the chemical agents on

the clothing. This is precisely the type of problem Shibuya is trying to avoid by using the mesh-type air and liquid permeable belt (10) and non-contacting suction device (20), dryer (22) and heater (36).

Bronander teaches moving the belts (12) at ***different speeds*** and even ***different directions*** in relation to the rolled material to create a frictional rubbing action. The intended purpose of Bronander is to provide this frictional rubbing action on the rolled material to remove marks or blemishes from the material after a dyeing process. As described above, this rubbing action teaches away from the proposed modification with Shibuya because Shibuya is specifically designed to avoid excessive contact with the clothing that could disrupt the chemical treatment.

Furthermore, the disclosure of Bronander directly contradicts with the language of Claim 1 in the present application. Claim 1 recites "moving the at least one absorbent body and the item of clothing at the ***same speed***." Bronander specifically teaches moving belt (12) at ***different speeds*** and even ***different directions*** as the cloth. This teaches away from the claimed invention. Applicants submitted these arguments previously and the Examiner responded on page 5 of the Final Office action dated February 9, 2006 as follows:

> "It should be noted that the examiner is relying on the teaching of Bronander's absorbent conveyor 12 for dewatering only. Therefore, it would have been obvious for one skilled in the art in view of the combined teachings of the prior art references, it would have been obvious to substitute conveyor of Bronander for the conveyor of Shibuya. The examiner did not rely on the speed of Shibuya to determine the patentability of the broad claims at issue."

Applicants' believe this further supports their position that the Examiner is using improper hindsight in formulating the proposed modification. First, Bronander provides no teaching regarding "dewatering". The Examiner states that Bronander is only being relied on for the teaching of the absorbent conveyor 12 for dewatering, but Bronander provides no such teaching. Rather, Bronander relates to rubbing out blemishes in the material, not absorbing moisture or dewatering. The prior art itself, not the applicant's

achievement, must establish the obviousness of the combination. *Interconnect Planning Corp. v. Feil*, 774 F.2d 1132, 1143, 227 USPQ 543, 551 (Fed. Cir. 1985) The Examiner is using the desire to improve the cloth dewatering efficiency to justify the position that the proposed modification would have been obvious. Only the Applicants' present application, not Bronander, relates to absorbing clothes moisture and cloth dewatering.

Second, as shown in the quote above, the Examiner is selectively picking portions of Bronander while disregarding other portions that teach away from the proposed modification. The Examiner must consider the references as a whole, even portions of the references that teach away. "Evidence that supports, rather than negates, patentability must be fairly considered." *In re Dow Chemical Co.*, 837 F.2d 469, 473, 5 USPQ2d 1529, 1532 (Fed. Cir. 1988) "It is impermissible, however, simply to engage in a hindsight reconstruction of the claimed invention, using the applicant's structure as a template and selecting elements from references to fill the gaps." *In re Gorman*, 18 USPQ2d 1885, 1888 (Fed. Cir. 1991) The absorbing felt material from Bronander has been selected to fill gaps in the template of the Applicants' claimed invention without identifying any teaching, suggestion or motivation within the prior art to make such a modification.

At the same time, portions of Bronander that teach away from the proposed modification and directly contradict the claimed invention have been disregarded. Bronander specifically teaches moving belt (12) at ***different speeds*** and even ***different directions*** as the cloth. The Examiner rationalizes this selective reading of the prior art by stating that the Examiner did not rely on those portion of the reference. This selective reading of the prior art suggests the Examiner used improper hindsight reconstruction to formulate the proposed modification.

There is no suggestion or motivation within the prior art for making the proposed modification of Shibuya and Bronander and the Examiner has not identified any such such suggestion. Applicants respectfully believe that any teaching, suggestion, or incentive possibly derived from the prior art is only present with hindsight judgment in view of the present application. To the contrary, Applicants have illustrated several clear and particular examples from the Shibuya and Bronander references that teach away from the proposed modification and even directly contradict the claim language. Therefore, the Examiner has not established a prima facie case of obviousness with respect to the

claimed invention, and it would not have been obvious for one of ordinary skill in the art to make the proposed modification of Shibuya and Bronander to derive the claimed invention.

For these and other reasons, Shibuya and Bronander, either alone or in combination, do not teach or suggest the subject matter defined by independent Claim 1. Therefore, Claim 1 is allowable. Claims 2 and 5-10 depend from Claim 1 and are allowable for the same reasons and also because they recite additional patentable subject matter.

Claim 3

Independent Claim 3 recites a method of removing moisture from items of clothing, which comprises: bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand; moving the at least one absorbent body and the item of clothing at the same speed; subsequently separating the item of clothing from the at least one absorbent body; removing moisture from the absorbent body following contact with the item of clothing; providing the absorbent body with a plurality of sections; and successively bringing individual sections of the absorbent body into contact with the item of clothing, separating the section from the item of clothing, and removing moisture from the item of clothing.

Claim 3 recites all the limitations of Claim 1, as well as additional limitations. Therefore, all the remarks above in relation to Claim 1 and the proposed modification of Shibuya and Bronander are also applicable to Claim 3. In addition, neither Shibuya nor Bronander disclose some of the additional limitations recited in Claim 3. For example, neither Shibuya nor Bronander disclose, among other things, "removing moisture from the absorbent body following contact with the item of clothing," as recited in Claim 3. As described above, Shibuya does not disclose an absorbent body and Bronander does not disclose anything regarding moisture or removing moisture.

For these and other reasons, Shibuya and Bronander, either alone or in combination, do not teach or suggest the subject defined by independent Claim 3. Therefore, Claim 3 is allowable. Claim 4 depends from Claim 3 and is allowable for the same reasons and also because it recites additional patentable subject matter.

Claim 11

Independent Claim 11 recites a method of removing moisture from items of clothing, which comprises: bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand and having a plurality of sections; circulating the absorbent body to successively move individual sections of the absorbent body into contact with the item of clothing and to a configuration for removing moisture from a section of the absorbent body; separating the section from the item of clothing; subjecting the item of clothing to action of at least one gas jet acting transversely to a surface of the item of clothing following contact with the absorbent body; and removing moisture from the absorbent body following contact with the item of clothing.

The Examiner has not established a prima facie case of obviousness with respect to the claimed invention, as recited in Claim 11. As described above in relation to Claim 1, there is no suggestion or motivation to combine Shibuya and Bronander. The same arguments above in relation to Claim 1 also apply to the combination of Shibuya and Bronander for Claim 11.

For these and other reasons, Takeuchi and Shibuya, either alone or in combination, do not teach or suggest the subject defined by independent Claim 11. Therefore, Claim 11 is allowable.

Claim 12

Independent Claim 12 recites a configuration for removing moisture from items of clothing, comprising: at least one absorbent body of an absorbent material in the form of a continuous strand being brought into contact with an item of clothing and being moved at the same speed as the item of clothing; and a contacting device adapted to contact an item of clothing with said at least one absorbent body and to separate the item of clothing from said at least one absorbent body.

The Examiner has not established a prima facie case of obviousness with respect to the claimed invention, as recited in Claim 12. As described above in relation to Claim 1, there is no suggestion or motivation to combine Shibuya and Bronander. The same

arguments above in relation to Claim 1 also apply to the combination of Shibuya and Bronander for Claim 12.

For these and other reasons, Shibuya and Bronander, either alone or in combination, do not teach or suggest the subject defined by independent Claim 12. Therefore, Claim 12 is allowable. Claims 13-15 depend from Claim 12 and are allowable for the same reasons and also because they recite additional patentable subject matter.

Claim 13 depends from Claim 12 and recites that the absorbent body is made from a microfiber material. As stated in the Final Office action dated February 9, 2006, the Examiner "takes official notice that it is well known in the moisture removing art to use microfiber material as absorbent." Applicants traverse this taking of official notice. In the rejection of Claim 12, the Examiner cites Bronander as disclosing an absorbent material. As described above, Bronander provides no teaching or disclosure regarding moisture removal or cloth dewatering efficiency. Rather, Bronander relates to rubbing out blemishes from dyed cloth. Shibuya provides no teaching or disclosure of any type of absorbent material. Rather, Shibuya teaches away from any type of absorbent body by disclosing a non-contacting drying means. Therefore, based on the prior art, it would not have been obvious to use a microfiber material for the absorbent body of the claimed invention.

Claim 16

Independent Claim 16 recites a configuration for removing moisture from items of clothing, comprising: at least one absorbent body of a microfiber material; a contacting device adapted to contact an item of clothing with said at least one absorbent body and to separate the item of clothing from said at least one absorbent body, said contacting device having a pressure-exerting roller spaced apart from said at least one absorbent body, and a transporting device moving a plurality of items of clothing successively in a direction of said at least one absorbent body and away therefrom and between said at least one absorbent body and said pressure-exerting roller.

The Examiner has not established a prima facie case of obviousness with respect to the claimed invention, as recited in Claim 16. As described above in relation to Claim 1, there is no suggestion or motivation to combine Shibuya and Bronander. The same

arguments above in relation to Claim 1 also apply to the combination of Shibuya and Bronander for Claim 16.

For these and other reasons, Shibuya and Bronander, either alone or in combination, do not teach or suggest the subject defined by independent Claim 16. Therefore, Claim 16 is allowable.

Claim 16 was also rejected as being unpatentable over Bronander alone. The Examiner states that "it is well know in the moisture removing art to use microfiber material as absorbent." The Examiner also states "it would have been obvious to one having ordinary skill in the art at the time the invention was made to further provide the cloth dewatering apparatus of Bronander with a microfiber absorbent in order to improve the dewatering efficiency."

Applicants disagree that using microfiber as an absorbent material would be obvious. There are a wide variety of absorbent materials having various specific properties and it is not always obvious to merely substitute one absorbent material for another. Such a conclusory statement that "it is well know in the moisture removing art to use microfiber material as absorbent" is not supported by any facts from the prior art and does not make the use of a microfiber in the apparatus recited in Claim 16 obvious. Bronander teaches using felt for the belt material. Felt is a fabric made of compressed matted animal fibers. The belt of Bronander rubs the rolled cloth material and is specifically designed to be relatively abrasive, such as felt, to remove the marks or blemishes from the rolled material after a dyeing process.

Microfiber is a fine synthetic woven fiber. There is no teaching or suggestion in the prior art to replace the compressed matted animal fiber felt material of Bronander with a microfiber. These materials have several different properties and are not necessarily suitable for the same purposes. As described above, Bronander is not particularly relevant to removing moisture from clothing. Bronander merely provides a frictional rubbing action to scrub marks or blemishes on rolled cloth material. There is no teaching or suggestion that a microfiber would be suitable for providing this frictional rubbing action that is necessary for the operation of Bronander. Therefore, it would not have been obvious to substitute the felt material of Bronander with a microfiber, as recited in Claim 16.

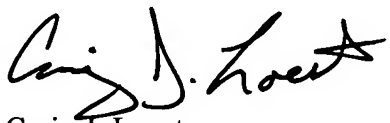
Bronander does not disclose, among other things, "a transporting device moving a plurality of items of clothing successively in a direction of said at least one absorbent body and away therefrom and between said at least one absorbent body and said pressure-exerting roller," as recited in Claim 16. Bronander does not disclose any items of clothing or removing moisture from items of clothing. Bronander also does not disclose any type of transporting device moving a plurality of items of clothing. Rather, Bronander merely discloses a bulk rolled material in a web form that is fed through a series of rubbing devices. The rolled cloth material of Bronander is not a plurality of items of clothing. Furthermore, the rubbing devices of Bronander are incapable of treating any type of individual item that is not connected in one continuous string. Therefore, Bronander does not teach or suggest all the claim limitations of Claim 16.

For these and other reasons, Bronander does not teach or suggest the subject defined by independent Claim 16. Therefore, Claim 16 is allowable.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either teach or suggest the features of Claims 1, 3, 11, 12 and 16. Claims 1, 3, 11, 12 and 16 are, therefore, believed to be patentable over the art and since all of the dependent claims are ultimately dependent on one of these claims, they are believed to be patentable as well.

In view of the foregoing discussion, Applicants respectfully request reconsideration and allowance of Claims 1-19.

Respectfully submitted,



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(8) CLAIMS APPENDIX

1. A method of removing moisture from items of clothing, which comprises:

bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand;

moving the at least one absorbent body and the item of clothing at the same speed; and

subsequently separating the item of clothing from the at least one absorbent body.

2. The method according to claim 1, which further comprises removing moisture from the absorbent body following contact with the item of clothing.

3. A method of removing moisture from items of clothing, which comprises:

bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand;

moving the at least one absorbent body and the item of clothing at the same speed;

subsequently separating the item of clothing from the at least one absorbent body;

removing moisture from the absorbent body following contact with the item of clothing;

providing the absorbent body with a plurality of sections; and

successively bringing individual sections of the absorbent body into contact with the item of clothing, separating the section from the item of clothing, and removing moisture from the item of clothing.

4. The method according to claim 3, which further comprises:

circulating the absorbent body to successively move the individual sections of the absorbent body to the item of clothing and to a configuration for removing moisture from a section of the absorbent body.

5. The method according to claim 2, which further comprises removing moisture from the absorbent body by squeezing.

6. The method according to claim 1, which further comprises rolling the at least one absorbent body on the item of clothing.

7. The method according to claim 1, which further comprises bringing the item of clothing into contact with at least two absorbent bodies separated from one another from different sides of the item of clothing.

8. The method according to claim 1, which further comprises forcing the item of clothing into contact with the at least one absorbent body with a gas jet.

9. The method according to claim 1, which further comprises subjecting the item of clothing to action of at least one gas jet acting transversely to a surface of the item of clothing following contact with the absorbent body.

10. The method according to claim 1, which further comprises:

bringing the absorbent body into contact with a batch of items of clothing section-by-section; and

moving the sections of the absorbent body brought into contact with at least one item of clothing to a collecting location at which, following removal of moisture from a last item of clothing in the batch, an entirety of the absorbent body has moisture removed from the absorbent body.

11. A method of removing moisture from items of clothing, which comprises:

bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand and having a plurality of sections;

circulating the absorbent body to successively move individual sections of the absorbent body into contact with the item of clothing and to a configuration for removing moisture from a section of the absorbent body;

separating the section from the item of clothing;

subjecting the item of clothing to action of at least one gas jet acting transversely to a surface of the item of clothing following contact with the absorbent body; and

removing moisture from the absorbent body following contact with the item of clothing.

12. A configuration for removing moisture from items of clothing, comprising:

at least one absorbent body of an absorbent material in the form of a continuous strand being brought into contact with an item of clothing and being moved at the same speed as the item of clothing; and

a contacting device adapted to contact an item of clothing with said at least one absorbent body and to separate the item of clothing from said at least one absorbent body.

13. The configuration according to claim 12, wherein said absorbent body is of a microfiber material.

14. The configuration according to claim 12, further comprising a transporting device moving a plurality of items of clothing successively in a direction of said at least one absorbent body and away therefrom.

15. The configuration according to claim 14, wherein:

said contacting device has a pressure-exerting roller spaced apart from said at least one absorbent body, and

said transporting device moves the items of clothing between said at least one absorbent body and said pressure-exerting roller.

16. A configuration for removing moisture from items of clothing, comprising:

at least one absorbent body of a microfiber material;

a contacting device adapted to contact an item of clothing with said at least one absorbent body and to separate the item of clothing from said at least one absorbent body, said contacting device having a pressure-exerting roller spaced apart from said at least one absorbent body, and

a transporting device moving a plurality of items of clothing successively in a direction of said at least one absorbent body and away therefrom and between said at least one absorbent body and said pressure-exerting roller.

(9) EVIDENCE APPENDIX

None

(10) RELATED PROCEEDINGS APPENDIX

None

PTO/SB/17 (12-04v2)
Approved for use through 07/31/2006. OMB 0651-0032
U.S. Patent and Trademark Office; U.S. DEPARTMENT OF COMMERCE

Effective on 12/08/2004.
Fees pursuant to the Consolidated Appropriations Act, 2005 (H.R. 4818).

FEE TRANSMITTAL
For FY 2005

☐ Applicant claims small entity status. See 37 CFR 1.27

TOTAL AMOUNT OF PAYMENT	($)	500.00

Complete if Known	
Application Number	10/608,571
Filing Date	06/27/2003
First Named Inventor	Edwin Bolduan et al
Examiner Name	Jiping Lu
Art Unit	3749
Attorney Docket No.	2001P12032WOUS

METHOD OF PAYMENT (check all that apply)

☐ Check ☐ Credit Card ☐ Money Order ☐ None ☐ Other (please identify): _____

☑ Deposit Account Deposit Account Number: 502786 Deposit Account Name: BSH Home Appliances Corp.

For the above-identified deposit account, the Director is hereby authorized to: (check all that apply)

☑ Charge fee(s) indicated below ☐ Charge fee(s) indicated below, except for the filing fee

☑ Charge any additional fee(s) or underpayments of fee(s) under 37 CFR 1.16 and 1.17 ☑ Credit any overpayments

WARNING: Information on this form may become public. Credit card information should not be included on this form. Provide credit card information and authorization on PTO-2038.

FEE CALCULATION

1. BASIC FILING, SEARCH, AND EXAMINATION FEES

	FILING FEES		SEARCH FEES		EXAMINATION FEES		
Application Type	Fee ($)	Small Entity Fee ($)	Fee ($)	Small Entity Fee ($)	Fee ($)	Small Entity Fee ($)	Fees Paid ($)
Utility	300	150	500	250	200	100	
Design	200	100	100	50	130	65	
Plant	200	100	300	150	160	80	
Reissue	300	150	500	250	600	300	
Provisional	200	100	0	0	0	0	

2. EXCESS CLAIM FEES

Fee Description	Fee ($)	Small Entity Fee ($)
Each claim over 20 (including Reissues)	50	25
Each independent claim over 3 (including Reissues)	200	100
Multiple dependent claims	360	180

Total Claims	Extra Claims	Fee ($)	Fee Paid ($)
_____ - 20 or HP =	_____ x	50.00 =	_____

HP = highest number of total claims paid for, if greater than 20.

Indep. Claims	Extra Claims	Fee ($)	Fee Paid ($)
_____ - 4 or HP =	_____ x	200.00 =	_____

HP = highest number of independent claims paid for, if greater than 3.

Multiple Dependent Claims	
Fee ($)	Fee Paid ($)
_____	_____

3. APPLICATION SIZE FEE

If the specification and drawings exceed 100 sheets of paper (excluding electronically filed sequence or computer listings under 37 CFR 1.52(e)), the application size fee due is $250 ($125 for small entity) for each additional 50 sheets or fraction thereof. See 35 U.S.C. 41(a)(1)(G) and 37 CFR 1.16(s).

Total Sheets	Extra Sheets	Number of each additional 50 or fraction thereof	Fee ($)	Fee Paid ($)
_____ - 100 =	_____ / 50 =	_____ (round up to a whole number) x	_____ =	_____

4. OTHER FEE(S)

	Fees Paid ($)
Non-English Specification, $130 fee (no small entity discount)	
Other (e.g., late filing surcharge): Appeal Brief Fee	500.00

SUBMITTED BY

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Name (Print/Type)	Craig J. Loest		Date October 6, 2006